

**MOSES & SINGER LLP**

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April 26, 2010

**VIA FACSIMILE ONLY**

Honorable James S. Gwin  
United States District Court  
Carl B. Stokes United States Court House  
801 West Superior Avenue  
Cleveland, Ohio 44113-1838

Re: *Melinda Serin, Judson Russ, Long Soui Lim, Peri Kettler, Gordon Redner, and Thomas J. Smith, v. Northern Leasing Systems, Inc., Jay Cohen, Rich Hahn, and Sara Krieger*  
Docket No. 06 CV 1625 (JSG)

Your Honor:

This firm represents defendants Northern Leasing Systems, Inc. ("NLS"), Jay Cohen, Rich Hahn and Sara Krieger (the "Individual Defendants"; together with NLS, "Defendants") in the referenced matter. Pursuant to Your Honor's Order dated April 16, 2010, and, subsequently, the telephonic status conference with Your Honor and counsel for Plaintiffs on April 20<sup>th</sup>, this letter is to confirm that, to date, no documents have been withheld on the grounds of privilege from Defendants' document productions in response to Plaintiffs' discovery requests. I have conferred with both prior counsel for NLS, Mr. Ken Kelly, Esq. of the law firm of Epstein Becker & Green LLP, and Joseph Sussman, Esq., of the Law Offices of Joseph Sussman, both of whom were involved with the first set of documents produced to Plaintiffs' counsel on behalf of Defendants in this matter. The second set of documents produced to Plaintiffs on behalf of Defendants was done by this firm, before last week's telephonic status conference with Your Honor. I personally reviewed those documents and did not withhold any documents from that production on the grounds of privilege.

Further to Your Honor's Order, we are working with NLS to supplement Defendants' productions with any additional documents they may have that are responsive to Plaintiffs' document requests – specifically, request numbers 4, 9, 12, 14 and 16. We anticipate receiving those documents, to the extent that they exist, sometime this week. To the extent that any of those documents are protected under any applicable legal privilege, such documents will be listed in a privilege log, which will be produced to Plaintiffs' counsel, with a copy to Your Honor's chambers, as set forth in Your Honor's Order.

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I understand from Plaintiffs' counsel, Mr. Chittur, that Plaintiffs are prepared to produce documents in response to Defendants' discovery requests sometime this week. In addition, we have submitted dates to Plaintiffs' counsel for each plaintiff's deposition. We are waiting to hear from them regarding each plaintiff's availability.

Sincerely yours,



Jennifer Nigro

cc. Chittur & Associates  
*Attorneys for Plaintiffs*